

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

JAMES JOSEPH JULUKE, JR.,	)	
an individual,	)	
	)	Case No.: 3:16-cv-1358-D
Plaintiff,	)	
v.	)	
	)	
L2Y2 LLC,	)	
a Texas Limited Liability Company,	)	
	)	
Defendant.	)	
<hr style="width: 40%; margin-left: 0;"/>	)	

**PLAINTIFF’S REQUEST FOR CLERK’S ENTRY OF DEFAULT**

Plaintiff JAMES JOSEPH JULUKE, JR. (“Plaintiff”), through his undersigned counsel, requests the Clerk enter a Default against Defendant L2Y2 LLC, (“Defendant”) in accordance with the provisions of Rule 55(a) of the Federal Rules of Civil Procedure, and in support thereof states the following:

1. On or about May 17, 2016, Plaintiff filed his Complaint [Dkt. No. 1]. A Summons was subsequently issued by the Clerk directed to L2Y2 LLC on May 17, 2016 [Dkt. No. 5].
2. On or about June 22, 2016, Defendant L2Y2 LLC was duly serviced with the Summons and Complaint as evidenced by the summons returned executed on June 30, 2016, and subsequently filed on July 7, 2016 [Dkt. No. 6].
3. On or about June 27, 2016, Plaintiff filed his First Amended Complaint [Dkt. No. 7]. The deadline for Defendant L2Y2 LLC to file its Answer to Plaintiff’s First Amended Complaint was August 17, 2016.

4. Consequently, Defendant has failed to file an answer or other responsive pleading herein, nor has an attorney appeared to otherwise defend the Defendant herein.
5. Furthermore, the time within which said Defendant is required to do so pursuant to Rule 12 has expired.

WHEREFORE, Plaintiff prays the Clerk of the District Court enter a Default of Defendant L2Y2 LLC.

Respectfully Submitted,

KU & MUSSMAN, P.A.

By: /s/ Louis I. Mussman  
Louis I. Mussman  
Attorney-in-charge

Florida Bar No. 597155  
N.D. TX No. 597155FL  
Ku & Mussman, P.A.  
6001 NW 153<sup>rd</sup> Street, Suite 100  
Miami Lakes, FL 33014  
Tel: (305) 891-1322  
Fax: (305) 891-4512  
[Louis@KuMussman.com](mailto:Louis@KuMussman.com)

and

Seth P. Crosland  
Local Counsel  
Texas Bar No.: 24069551  
Brandy Austin Law Firm, PLLC  
2404 Roosevelt Drive  
Arlington, Texas 76016  
Tel: (817) 841-9906  
Fax: (817) 484-0280  
[seth@brandyAustinlaw.com](mailto:seth@brandyAustinlaw.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7<sup>th</sup> day of November, 2016, a true and correct copy of the foregoing was submitted to the Clerk of Court using the CM/ECF system, and a true and correct copy of the foregoing has been furnished by U.S. Mail to: L2Y2 LLC, c/o Lyne Lee, Registered Agent, 2775 Villa Creek Dr., Suite 220, Dallas, TX 75234.

By: /s/ Louis I. Mussman  
Louis I. Mussman